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July 31, 2024

VIA ECF

The Honorable Victoria Reznik
Federal Building and United States Courthouse
300 Quarropas St., Room 420
White Plains, NY 10601-4150

Re: Natalie Grainger v. Westchester Country Club, Inc., et al.;
Case No. 7:23-cv-01802 (CS) (VR)

Dear Judge Reznik:

We represent Plaintiff Natalie Grainger (“Plaintiff”) and write jointly with counsel for Defendants Westchester Country Club, Inc. (“WCC”), Mark Christiana and Tom Nevin (together, “Defendants”) (together, the “Parties”) pursuant to this Court’s Order dated July 1, 2024, to update the Court on the status of discovery. See Dkt. No. 82.

Presently, all non-party depositions have been scheduled. However, due to witness and attorney availability, the Parties have been unable to conduct the necessary non-party depositions in advance of July 31, 2024, the current fact discovery deadline. Accordingly, subject to this Court’s approval, the Parties have scheduled the remaining non-party depositions to take place on August 5, August 13 and August 15, 2024. Moreover, Defendants owe Plaintiff responses to supplemental interrogatories and requests for the production of documents served on April 30, 2024 and June 27, 2024, respectively. Defendants have advised Plaintiff that they intend to produce the outstanding discovery this week. Thus, the Parties respectfully request that the deadline for fact discovery be extended from July 31 to August 15, 2024 in order to complete discovery and conduct the remaining non-party depositions.¹

¹ As Plaintiff has previously advised counsel for Defendants, the outstanding discovery regarding its after-acquired evidence defense must be produced reasonably in advance of the deposition currently scheduled on August 15, 2024. To the extent that Defendants fail to produce the responsive information and documents in short order, Plaintiff reserves the right to seek a further, brief extension of fact discovery for the sole purpose of reviewing the newly produced discovery and conducting the corresponding non-party deposition.



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We thank the Court for its time and attention.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Valdi Licul".

Valdi Licul

Cc: All Counsel of Record (*via* ECF)